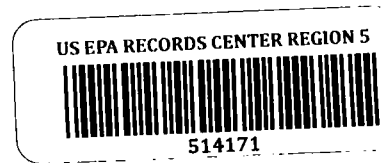




STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL



ADDRESS REPLY TO:
OFFICE OF THE ATTORNEY GENERAL
MINNESOTA POLLUTION CONTROL AGENCY
1935 W. COUNTY ROAD B2
ROSEVILLE, MINNESOTA 55113
(612) 296-7342

March 12, 1981

Robert Leininger
Enforcement
EPA-Region V
EWPE
230 S. Dearborn St.
Chicago, Il. 60604

Frederick F. Stiehl
Attorney/Advisor
Hazardous Waste Enforcement Task Force
U.S. Environmental Protection Agency
401 M Street S.W.
EN335
Washington, D.C. 20460

Erica Dolgin
Hazardous Waste Section
U.S. Dept. of Justice
Land & Natural Resources Division
Room 1511
Washington, D.C. 20530

Re: Computer Printouts for Reilly Tar Litigation

Dear Bob, Fred and Erica:

Enclosed are two printouts which will simplify accessing document on microfiche supplied you in the Reilly Tar and Chemical case. By using the Key Word List any word, date, or number which was used to describe the documents as grouped on film can be located with a reference given to the full description in the second printout, the File Structure Descriptive List. For example, the word "phenol" can be found alphabetically in the Key Word List. The list indicates that this word was used 17 times in 15 different document grouping descriptions, which are listed. By referring to the File Structure Descriptive List the full description with this word in it can be found. The first reference, 140, for example, indicates that the word "phenol" was used in the title of a report which is located on film by File Structure Number 04.27-038.0 and is in our paper files in Box 24, Folder 28.

It should be remembered that these descriptions are generalized and serve only as a guide to the document contents. The listings are crude, but useful tools. They were created using the customized editing system in the State's Revisor of Statutes Office in conjunction with Aspensearch 4, a conversion

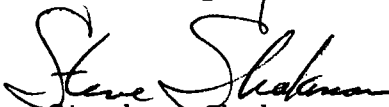
Page 2
March 12, 1981

program which was written for this project and a special utility program. All data input was done in-house by the Attorney General's staff. Our office is currently in final negotiations on contracts for a document specific computerized data management system for the Reilly case. Contrary to earlier indications, we will not be requesting use of the Justice Department computer system for this project.

These printouts are deemed work products and are not to be disclosed to persons other than those directly working on the federal and state litigation effort against Reilly Tar.

Should you have any questions concerning the use of these printouts, please call Ken Stevenson at (612) 296-7708.

Sincerely,


Stephen Shakman
Special Assistant
Attorney General

SS:jh
Enclosures

reference file sources for microfiche

Minnesota Attorney General Offices

- 01 Chronological Files
 - .01 Chron. Index
 - .02 Chron. Doc. File
 - .03
 - to Research
 - .99
- 02 Pleadings
 - .01
 - to In order of Receipt
 - .99
- 03 Legal Research
 - .01 Abstention
 - .02
 - .03 Appropriations
 - .04 Coal tar and creosote
 - .05 Discovery
 - .06
 - .07 Estoppel -
 - .08
 - .09 Fed. Ct. Jurisd.
 - .10 Groundwater Pollution
 - .11 Intervention
 - .12
 - .13 Laches - Failure to Prosecute
 - .14
 - .15 Lawyers Technical Articles
 - .16
 - .17 Misc. Fed. Develop.
 - .18 Negligence
 - .19 Nuisance
 - .20 Permits
 - .21 Protective Order
 - .22 Public Trust
 - .23 Resource Recovery & Conservation Act
 - .24 Responsible Person - \$115.061
 - .25 Retroactivity
 - .26
 - .27 Similar Cases & Investigations
 - .28 Statute of Limitations
 - .29 Statutes and Regulations
 - .30
 - .31 Strict Liability
 - .32
 - .33 Successors' Liability
 - .34
 - .35 Tort Cases - General
 - to (Reserved)
 - .98 Confidential (AG Eye Only)
 - .99 Confidential (AG & Feds)

.04 Attorney Notes and Working Papers

- .09 Stensvaag, J.M.
- .03 Heffern, J.
- .01 Coyne, D.
- .08 Shakman, S.
- .06 Lindall, R.
- .05 Kaul, E.
- .10 Van De North, J.
- .07 Moilanen, R.
- .02 Donchue, W.
- .04 Johnson, G. R.
- .11 Stevenson, Ken
- .25 Misc. Attorney Notes and Working Papers, Not Identified
- .27 Attorney General Files (Non-privileged) Produced to Reilly
- .28 Documents produced to St. Louis Park
- .29 Medicial Articles
- .30 Process Articles and Reports
- .70 Working Committee
- .71 General Work Product
- .72 Expert's working Papers
- to (Reserved)
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

05 Ag Correspondence With:

- .01 St. Louis Park Attorneys - Litigation
- .02 St. Louis Park Attorneys - Louisiana Avenue, NPDES and others
- .03 Reilly Tar Attorneys
- .04 EPA - Washington Attorneys
- .05 EPA - Chicago Attorneys
- .06 EPA - Technical Experts
- .07 Justice Department Attorneys
- .08 U.S. Attorney - Mples
- .09 U.S. Geological Survey
- .10 Litigation and Staff File
- .11 General Correspondence (Non-privileged)
- .12 St. Louis Park Officials
- .13 State Experts
- .14 Client (State Employees)
- to (Reserved)
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

Minnesota Pollution Control Agency

13 Employee Files

- .01 Terry Hoffman
- .02 Lou Breimhurst
- .03 Jay Heifern
- .04 Gordy Meyer
- .05 Perry Beaton
- .06 Bob Criswell
- .07 Rick Ferguson
- .08 Dale Wikre (Water Quality Div. Notes from D.W.)
- .09 Larry Johnson
- .10 George Koonce
- .11 Johannes
- .12 John Aho
- .13 Larry Anderson
- .14 John Badalich
- .15 Lewis Barbe
- .16 Sandra Gardebring
- .17 Peter Gove
- .18 R. A. Kaiser
- .19 Grant Merritt
- to
- .90 Privileged
- to
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

14 MPCA Misc.

- .01 Air Quality Division
- .02 MPCA Board Members
- .03 Oak Park Village Development
- .04 Blue prints
- .05 Misc. Reports and Correspondence
- .06 Solid Waste Division
- .07 Misc. correspondence and memos
- to
- .90 Privileged
- to
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

15 Reserve

Minnesota Department of Health

17 Employee Files

- .01 Roman Koch
- .02 Paul B. Johnson
- .03 Tony Manovkian
- .04 Mike Convery
- .05 Doug Mandi
- .06 Richard Wade
- .07 Roger DeRoos
- .08 Pauline Bouchard
- .09 Dave Geise
- .10 David Gray
- .11 Andrew Dean
- .12 Bill Hall
- .13 Eunice Sigardson
- .14 Kari Dusich
- .15 Russ Frazier
- .16 Ed Ross
- .17 William Scruton
- .18 Larry Gust
- .19 Jim Nye
- .20 Char Kanniainen
- .21 Frederick Heisel
- .22 Warren R. Lawson
- .23
- .24
- .25
- to
- .90 Privileged
- to
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

18 Misc.

- .01 Water Supply Reports
- .02 General MDH Files
- .03 Health Research Notebooks
- .04 Hazardous/Toxic Substances file
- .05 Consultant Study Proposals for Remedial Action
- .06
- .07
- .08
- to
- 90 Privileged
- to
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

19 Reserved

to
20

Other State Agencies and Departments

21 Departments and Agencies

- .01 Mn/Dot
- to
- .06 Mn Geol. Survey
- to
- .11 MEQB (formerly MEQC)
- to
- .90 Privileged
- to
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

USGS

22 USGS Files

- .01 Marc Hult - Working Papers and Raw Data
- .02 Marc Hult - Research Materials and Articles
- .03 Marc Hult - Preliminary Reports
- .04 Marc Hult - Final Reports
- .05 Documents produced to Reilly Tar Consultant, ERT, 4-24-80
- .06
- to
- .90 Privileged
- to
- .98 Confidential (AG Eyes Only)
- .99 Confidential (AG & Feds Eyes Only)

Federal Agencies and Departments

26 Non-Privileged Documents

- .01 EPA
- to
- .50 Justice Department

27 Research

- to
- 29

City of St. Louis Park

30 Documents Produced

.01 Documents produced to Reilly by date of production
.02 to State
.03
to
.90 Privileged

31
to Reserved
33

Reilly Tar and Chemical Corporation

34 Documents Produced

.01 5/29/79
.02 10/30/79 By date of production to State
.03 7/80
to
.99

35
to Reserved
48

49 Miscellaneous

.01
to
.90 Privileged
to
.98 Confidential (AG Eyes Only)
.99 Confidential (AG & Fed's Eyes Only)

50.01
to Oversize Documents
.99

Depositions 51 through 74

Trial Transcripts 75 through 99